

# Foundation for Healthcare Innovation and Development (FHIND) Record Management and Retention Policy

## September 2023

#### 1. Introduction

Information is a corporate asset and the records of FHIND are important sources of administrative, evidential, and historical information. They are vital to the organisation in its current and future operations, for accountability, and for an awareness and understanding of its history and procedures.

#### 2. Definition

Records are defined as all those documents, regardless of format, which facilitate the business carried out by FHIND and which are thereafter retained to provide evidence of its transactions or activities. These records may be created, received or maintained in hard copy or electronically. Records management is defined as a field of management responsible for the efficient and systematic control of the creation, receipt, maintenance, use, distribution, storage and disposal of records.

# 3. Scope of the Policy

This policy applies to all records created, received, or maintained by staff while carrying out their responsibilities as FHIND employees. Records and documentation created in the course of research, whether internally or externally funded, are also subject to contractual record-keeping requirements.

A small percentage of FHIND's records will be selected for permanent preservation, as part of the organisation's archives, for historical research and as an enduring record of the conduct of business.

All employees will be responsible for creating and maintaining records in relation to their work that are authentic and reliable.

# 4. Policy Statement

FHIND is committed to creating, keeping, and managing its records in a manner that accurately documents its activities and that meet its statutory obligations. The policy aims to define and provide a framework for managing FHIND's records and to establish accountabilities to ensure FHIND:

- creates and captures authentic and reliable records to demonstrate evidence, accountability and information about its decisions and activities.
- securely maintains and preserves access to those records as long as they are required to support FHIND's operations.
- confidentially destroys those records as soon as they are no longer required.

- meets legal record-keeping requirements, including the Data Protection Act 2023 and the Freedom of Information Act 2011 of Nigeria
- identifies and preserves securely those records deemed worthy of permanent preservation, protects vital records, which FHIND needs to function effectively.

# 5. Implementation

The Policy will be realised by the development of the following:

- a retention schedule to regulate how long records are retained by FHIND.
- a vital records policy to protect those records that are essential to the smooth operation of the organisation.
- an archive to house those administrative records that need to be retained beyond the immediate operational needs, in a cost-effective manner but from which records can still be retrieved when necessary.
- a classification scheme to ensure records that demonstrate board and management decisions and actions are created and/or captured.
- a disposal policy to show the procedures for destroying records so they are disposed of consistently by confidential shredding, with documented authorisation,
- a disaster plan to document actions, which need to be taken if a disaster was to occur affecting the archive.

# 5.1 Security and Access

The following confidentiality classification scheme will guide access to and handling of FHIND's records:

Classification	Definition
Public	May be viewed by anyone, anywhere in the world
Normal	Normal Available to all authenticated members of Foundation staff
Confidential	Confidential Available only to authorised and authenticated members of staff
Strictly Confidential	Access is controlled and restricted to a small number of named, authenticated members of staff

# 6. Staff Guidance

The Records Manager will provide guide notes for Good Practice in hard copy, and on the intranet for FHIND staff. In particular, guidelines will be supplied in the form of:

- a retention schedule to show staff how long to keep certain types of records in their care so they are not retained longer than is necessary or destroyed before they should be.
- guidelines to show staff how to create, capture and record metadata for records in their care to ensure a consistent method is employed across the University that will enable information to be searched easily.

• Step-by-step guidelines to show staff how to transfer records to the archive, retrieve transferred records and how to confidentially dispose of records.

The FHIND Records Manager will develop and implement, with the help of appropriate staff and resources, a training programme for all members of staff to understand and use the methods for managing information, which are developed as part of this Policy.

### 7. Responsibilities

The Records Manager will be responsible for developing the Policy with Heads of Department and other managers, and will be responsible for promoting, implementating, maintaining and monitoring records management in conjunction with other departments.

The Records Manager with the assistance of Heads of Departments will:

- ensure records are held on the most appropriate medium for the task they perform.
- transfer records to the Archive.
- identify those records that are vital to the operation of the organisation, and ensure they are preserved appropriately.
- preserve appropriately those records identified as worthy of permanent preservation.
- review records that have reached their retention period.
- confidentially destroy with appropriate documentation those records that have reached the end of their retention period.

#### 7.1 Destruction

Destruction of records must include all copies, including security copies, preservation copies and where possible backup copies, held in any format. These must be destroyed simultaneously and must be guided by the information confidentiality scheme outlined in section 5,1 above. The requirements below will apply for hard copies:

Classification	Method of disposal
Public	Can be disposed of in ordinary waste or recycling bins.
Normal	For some records in this category disposal in ordinary recycling bins will be appropriate, but many must be shredded.
Confidential	Must be shredded.
Strictly Confidential	Must be shredded.

# 8. Disposal of information technology (IT) equipment

All disposal of IT equipment must be carried out in collaboration with IT support services to ensure that it is done securely and that any information remaining on any storage device is securely wiped.

# 9. Policy review and ownership

We commit to reviewing and updating this policy as often as necessary but at least every three years.